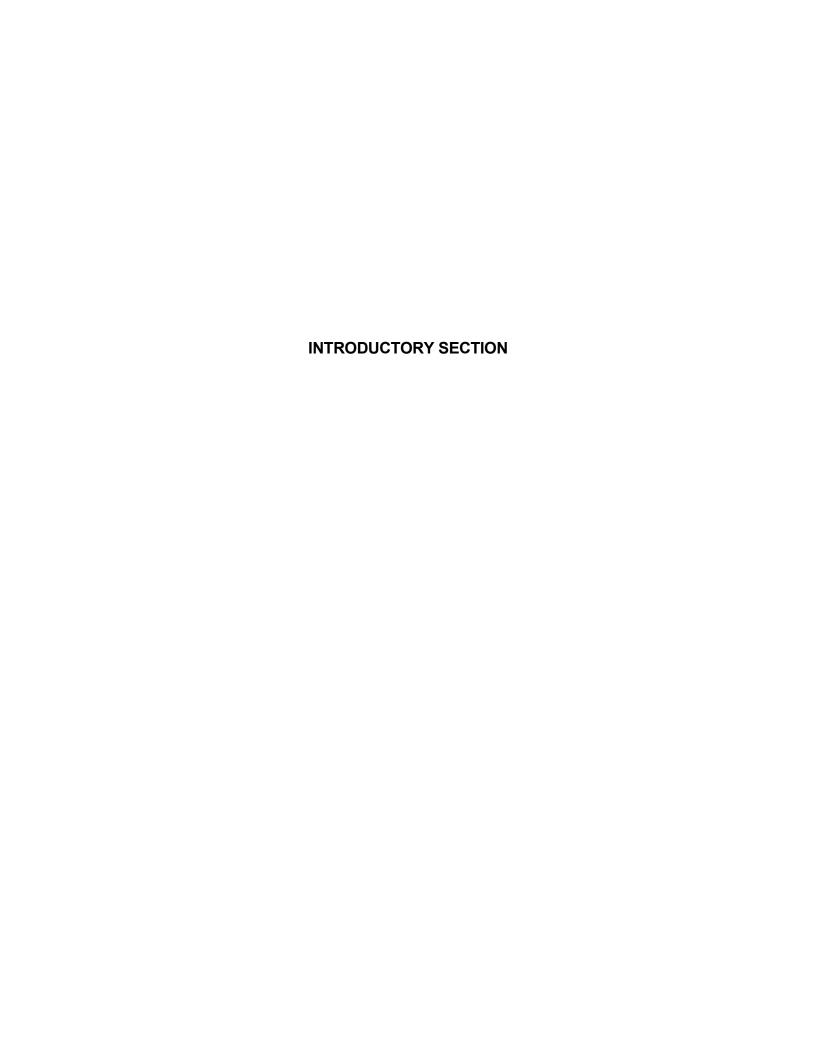
Financial Statements and Reports of Independent Certified Public Accountants

Dunthorpe-Riverdale Service
District No. 1 – A Component Unit of
Multnomah County, Oregon

June 30, 2001 and 2000



DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON

BOARD OF COUNTY COMMISSIONERS* AS OF JUNE 30, 2001 501 SE Hawthorne, 6th floor Portland, Oregon 97214

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Diane Linn, Chair of the Board December 31, 2002

Serena Cruz, Commissioner December 31, 2002

Lisa Naito, Commissioner December 31, 2004

Lonnie Roberts, Commissioner December 31, 2004

Maria Rojo de Steffey, Commissioner December 31, 2004

REGISTERED AGENT

David A. Boyer

REGISTERED OFFICE

501 SE Hawthorne, 4th floor PO Box 14700 Portland, Oregon 97293-0700

^{*} Governing body of Dunthorpe-Riverdale Service District No. 1 reported on herein.

DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON

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MULTHOMAH COUNTY OREGON

DEPARTMENT OF SUPPORT SERVICES FINANCE DIVISION

DIANE LINN, CHAIR
MARIA ROJO DE STEFFEY,
DISTRICT #1
SERENA CRUZ, DISTRICT #2
LISA NAITO, DISTRICT #3
LONNIE ROBERTS, DISTRICT #4

COUNTY COMMISSIONERS

MULTNOMAH BUILDING 501 SE HAWTHORNE BLVD. 4TH FLOOR PO BOX 14700 PORTLAND, OR 97293-0700 PHONE (503) 988-3312 FAX (503) 988-3292 FORD BUILDING 2505 SE 11TH 1ST FLOOR

PORTLAND, OR 97202 PHONE (503) 988-5111 FAX (503) 988-3252 TDD (503) 988-5170

December 7, 2001

Honorable County Chair and Board of County Commissioners Multnomah County, Portland, Oregon

We are pleased to submit the Financial Statements and Additional Information Report for Dunthorpe-Riverdale Service District No. 1, Portland, Oregon (the District), for the fiscal years ended June 30, 2001 and 2000. This report includes the opinion of our independent auditors, Grant Thornton LLP, Certified Public Accountants.

We prepared this report for the Secretary of the State of Oregon as required under ORS 297.425. The District's financial statements are also included in the Comprehensive Annual Financial Report of Multnomah County (the County) as a blended component unit. This is necessary because the Board of County Commissioners of Multnomah County maintains overall financial accountability for the District.

Dunthorpe-Riverdale Service District No. 1 was organized in 1964 under the provisions of ORS 451. The District's purpose was to finance the construction and operation of sanitary sewer systems in the southwest areas of the County, bordering the Willamette River and a small portion of northern Clackamas County. By 1970 the District had eliminated a major source of pollution in the Willamette River.

The District is accounted for as an enterprise fund. Enterprise funds generate revenue for operations by charging user fees to recover all costs of goods and services to the public. The measurement focus is on a flow of economic resources and the accrual basis of accounting is used. Under the accrual basis of accounting, revenues are recorded at the

time they are earned and expenses are recorded at the time the liabilities are incurred.

Oregon Local Budget Law requires the use of budgetary control. The "Additional Information" section of the report includes the related budgetary schedules.

The District consists of approximately 553 households at June 30, 2001. Modest growth has been achieved primarily through subdivision of large estates and in-fill of previously unbuildable lots. During the past five years small operating losses have been offset by interest income, resulting in small net incomes or losses which are close to break-even. The District continues to maintain a strong working capital position. Following is a summary of some key financial data which is summarized from current and prior years' financial statements:

	Year ended June 30										
	<u>2001</u>	2000	<u>1999</u>	<u>1998</u>	<u>1997</u>						
Operating revenue	\$249,149	\$254,791	\$244,209	\$237,930	\$205,018						
Depreciation expense	33,474	28,374	28,374	28,374	28,374						
Operating income (loss)	(36,880)	12,642	20,252	19,565	22,471						
Net income (loss)	29,415	66,052	64,090	60,456	57,326						
Capital contributions	2,500	5,000	10,000	10,000	9,930						
Net working capital	494,122	941,233	841,807	739,343	640,513						
Total assets	2,081,995	1,585,289	1,457,743	1,377,018	1,301,893						
Total equity	1,511,376	1,481,961	1,410,909	1,336,819	1,266,363						

I would like to acknowledge the help of the Finance Division staff, especially Bill Moravics, Financial Specialist II, and Mindy Harris, Accounting Manager, who aided me in the preparation of this report. I appreciate their excellent work. I also want to thank the staff in the Department of Sustainable Community Development for their contributions during the year.

Respectfully submitted,

David A. Boyer, CCM Finance Director





Report of Independent Certified Public Accountants

The Board of County Commissioners Dunthorpe-Riverdale Service District No. 1

We have audited the accompanying general purpose financial statements of Dunthorpe-Riverdale Service District No. 1 as of June 30, 2001 and 2000 and for the years then ended, as listed in the table of contents. These general purpose financial statements are the responsibility of Dunthorpe-Riverdale Service District No. 1's management. Our responsibility is to express an opinion on these general purpose financial statements based on our audit.

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the general purpose financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the general purpose financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall general purpose financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the general purpose financial statements referred to above present fairly, in all material respects, the financial position of Dunthorpe-Riverdale Service District No. 1 as of June 30, 2001 and 2000 and the results of its operations for the years then ended, in conformity with accounting principles generally accepted in the United States of America.

Our audits were made for the purpose of forming an opinion on the general purpose financial statements taken as a whole. The schedules listed in the table of contents as "Additional Information" are presented for purposes of additional analysis and are not a required part of the general purpose financial statements of Dunthorpe-Riverdale Service District No. 1. Such information has been subjected to the auditing procedures applied in the audit of the general purpose financial statements, and in our opinion, is fairly presented, in all material respects, in relation to the general purpose financial statements taken as a whole.

GRANT THORNTON LLP

Portland, Oregon December 4, 2001

By: /s/ Gary C. Homsley

DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON BALANCE SHEETS

	_	Ju	ne 30)
ASSETS	_	2001	_	2000
Current assets: Deposits with fiscal agents (Note 2)	\$	1,051,021	\$	1,030,170
Receivables, net (Note 3) Prepaid expense	Ψ _	13,720	Ψ _	14,391
Total current assets	_	1,064,741	_	1,044,561
Property and equipment, at cost Less: accumulated depreciation	_	1,928,698 (911,444)	_	1,418,698 (877,970)
Net property and equipment	_	1,017,254	_	540,728
Total assets	\$_	2,081,995	\$_	1,585,289
LIABILITIES AND EQUITY				
Current liabilities: Accounts payable	\$_	570,619	\$_	103,328
Equity: Contributed capital (Note 4) Retained deficit (Note 5)	_	1,850,663 (339,287)	_	1,850,663 (368,702)
Total equity	_	1,511,376	_	1,481,961
Total liabilities and equity	\$_	2,081,995	\$ <u>_</u>	1,585,289

The accompanying notes are an integral part of the component unit financial statements.

DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON STATEMENTS OF REVENUES, EXPENSES AND CHANGES IN RETAINED DEFICIT

	_	Year Ended June 30						
	_	2001		2000				
Operating revenues:	c	240 440	c	254 704				
Sewer user assessments	\$_	249,149	\$	254,791				
Operating expenses:								
Cost of sales and services		245,634		206,518				
Depreciation		33,474		28,374				
Administrative support (Note 6)	_	6,921		7,257				
Total operating expenses	_	286,029		242,149				
Operating income	_	(36,880)		12,642				
Non-operating revenue:								
Interest income		63,795		53,410				
Contributed Connection Fees		2,500		0				
Total non-operating revenues	_	66,295		53,410				
, ,	_	<u> </u>		, , , , , , , , , , , , , , , , , , , ,				
Net income		29,415		66,052				
Retained deficit, beginning of year	_	(368,702)		(434,754)				
Retained deficit, end of year	\$_	(339,287)	\$	(368,702)				

The accompanying notes are an integral part of the component unit financial statements.

DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON STATEMENTS OF CASH FLOWS

	_	Year End	ded .	d June 30				
	_	2001	-	2000				
Cash flows from operating activities: Operating income Adjustments to reconcile operating income to cash provided by operating activities:	\$	(36,880)	\$	12,642				
Depreciation Changes in assets and liabilities:		33,474		28,374				
(Increase) decrease in receivables Increase in accounts payable	_	671 467,291		(1,613) 56,494				
Net cash provided by operating activities	_	464,556	-	95,897				
Cash flows from noncapital financing activities: Contributions from connection fees	_	2,500	-	5,000				
Net cash provided by noncapital financing activities	_	2,500		5,000				
Cash flows from capital and related financing activities: Acquisition of fixed assets	_	(510,000)	-					
Net cash used by capital and related financing activities	-	(510,000)						
Cash flows from investing activities: Interest income	_	63,795		53,410				
Net cash provided by investing activities	_	63,795		53,410				
Net increase in cash and cash equivalents		20,851		154,307				
Deposits with fiscal agents, beginning of year	_	1,030,170	-	875,863				
Deposits with fiscal agents, end of year	\$_	1,051,021	\$	1,030,170				

The accompanying notes are an integral part of the component unit financial statements.

DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON NOTES TO FINANCIAL STATEMENTS June 30. 2001 and 2000

1. Organization and Summary of Significant Accounting Policies

Dunthorpe-Riverdale Service District No. 1 (the District) was organized in 1964 under the provisions of Oregon Revised Statutes (ORS) Chapter 451 to finance the construction and operation of sanitary sewer systems in the southwest unincorporated area of Multnomah County (the County), bordering the Willamette River and a small portion of northern Clackamas County. The Multnomah County Board of Commissioners is the governing body of the District, as provided for by ORS 451.485.

Reporting Entity

The accompanying financial statements have been prepared for purposes of Oregon statutory reporting requirements. As the Multnomah County Board of Commissioners maintains overall financial accountability for the District, the financial statements of the District are included in the financial statements of the County, as an enterprise fund.

Basis of Accounting

The financial statements are prepared on the accrual basis of accounting. Under the accrual basis of accounting, revenues are recorded at the time they are earned and expenses are recorded at the time the liabilities are incurred. The measurement focus is on the flow of economic resources. With this measurement focus, all assets and all liabilities associated with the operations are included on the balance sheet. All Financial Accounting Standards Board (FASB) Statements and Interpretations, Accounting Principles Board Opinions, and Accounting Research Bulletins of the Committee on Accounting Procedure issued on or before November 30, 1989, unless those pronouncements conflict with or contradict GASB pronouncements, have been applied.

Property and Equipment

Property and equipment consist of sewer lines and pumping facilities and are stated at historical cost or estimated historical cost at time of acquisition, or fair value on date donated for donated assets. Fixed assets valued at estimated historical costs are minor. Normal maintenance and repairs are expensed as incurred. Expenditures for major additions, improvements and replacements are capitalized. Gain or loss on retirement or disposal is reflected in income.

Depreciation on property and equipment is provided on the straight-line method at rates based on the estimated lives of the related assets, which are 50 years for sewer lines and pumping facilities. Depreciation on assets acquired through contributions is charged to retained earnings.

DUNTHORPE-RIVERDALE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON NOTES TO FINANCIAL STATEMENTS (Continued)

Organization and Summary of Significant Accounting Policies (continued)

Budgets

The District prepares budgets as required by State law. The budget process is described in the Multnomah County June 30, 2001 Comprehensive Annual Financial Report.

Cash Flows

For purposes of the statements of cash flows, the District considers the account titled Deposits with Fiscal Agents, which consists of the District's share of cash held by the County Finance Division in a manner similar to a cash management pool, to be cash and cash equivalents.

2. <u>Deposits with Fiscal Agents</u>

Cash is held by the County Finance Division and is commingled with the cash, time deposits and investment accounts of the County. The District is allocated investment earnings based on its proportionate cash balance monthly. See the Multnomah County June 30, 2001 Comprehensive Annual Financial Report for: basis of investments, types of investments and information regarding the risk categories of investments held.

3. Receivables

June 30					
2001	2000				
\$16,071	\$14,799				
(2450)	(600)				
13,621	14,199				
99	192				
\$13,720	\$14,391				
	2001 \$16,071 (2450) 13,621 99				

The allowance for doubtful accounts represents the District's best estimate of receivable amounts that will not be collected. In determining the allowance, the District considers historical write-offs as well as current economic factors.

DUNTHORPE-RIVERDALE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON NOTES TO FINANCIAL STATEMENTS (Continued)

4. Contributed Capital

The following is a summary of the activity in the contributed capital account:

Contributed Capital, June 30, 1999 \$1,845,663

Add:

Contributions from connection fees 5,000
Contributed Capital, June 30, 2000, 2001 1,850,663

5. Retained Deficit

The District has an unreserved retained deficit of \$339,287 at June 30, 2001. The deficit exists because sewer user service charge rates have not been sufficient over the life of the District to cover expenses. The District's current policy is to recover the cost of operations through user charges. The District has a positive total fund equity due to contributed capital.

6. <u>Transactions with Multnomah County</u>

The County Department of Sustainable Community Development provides operating management and planning for the District. General administrative functions are performed by other units of the County. All services are performed on a cost reimbursement basis. Reimbursements to the County were \$6,921 and \$7,257 for fiscal 2001 and 2000, respectively.

7. Intergovernmental Agreements

The City of Portland provides sewer line and pump maintenance, transportation and sewage treatment for the District.

8. Risk Management

See Note 14 - Risk Management in Multnomah County's June 30, 2001 Comprehensive Annual Financial Report for information pertaining to risk management activities.

DUNTHORPE-RIVERDALE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON NOTES TO FINANCIAL STATEMENTS (Continued)

9. Reclassifications

Certain reclassifications were made to the 2000 numbers in order to conform to current year presentations.

10. GASB No. 33

The county adopted GASB No. 33, Accounting for Financial Reporting for Nonexchange Transactions, effective July 1, 2000. Accordingly, the County began recognizing capital contributions to proprietary funds as revenue instead of contributed capital.



DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON BUDGETARY BASIS

The following Schedule of Revenues and Expenditures for the District is prepared on a budgetary basis which differs from generally accepted accounting principles and the accompanying component unit financial statements in the following respects:

- Special assessment and property tax revenue is recognized as it becomes measurable and available;
- · Capital outlay is reflected as an expenditure;
- · Contributed capital, other than non-current assets, is reflected as revenue; and
- · Depreciation is not recorded.

DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF MULTNOMAH COUNTY, OREGON SCHEDULE OF REVENUES AND EXPENDITURES BUDGET AND BUDGETARY BASIS ACTUAL FOR THE FISCAL YEAR ENDED JUNE 30, 2001 (Unaudited - See accompanying auditors' report)

	 Budget	 Actual		Variance favorable (unfavorable)
REVENUES:				
Assessments - sewer	\$ 248,000	\$ 248,436	\$	436
Charges for services	10,000	2,500		(7,500)
Interest	25,000	 63,794	_	38,794
Total revenues	283,000	 314,730	_	31,730
BEGINNING FUND BALANCE	850,000	928,761		78,761
Total	\$ 1,133,000	\$ 1,243,491	\$	110,491
EXPENDITURES:				
Environmental Services:				
Materials and services	\$ 243,000	\$ 250,705	\$	(7,705)
Capital outlay	510,000	510,000		0
Contingency	40,000	0		40,000
Total expenditures	 793,000	 760,705	· -	32,295
ENDING FUND BALANCE	340,000	482,786		142,786
Total	\$ 1,133,000	\$ 1,243,491	\$	110,491

DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF

MULTNOMAH COUNTY, OREGON

SCHEDULES OF SPECIAL ASSESSMENT TRANSACTIONS

FOR THE YEARS ENDED JUNE 30, 2000 AND 2001

(Unaudited - See accompanying auditors' report)

Fiscal Year 2001

		Amounts Uncollected June 30, 2000	-	Levy/ Assessments as Extended by Assessor	_	Discounts Allowed	-	Interest Received	_	Cancellations and Adjustments	_	Interest and Tax/ Assessment Collections	_	Amounts Uncollected June 30, 2001
Gei	neral Fund Special Assessmen	:												
	2000-2001	\$ -	\$	257,172	\$	(6,093)	\$	148	\$	(581)	\$	(241,452)	\$	9,194
	1999-2000	8,642						217		(1,325)		(3,604)		3,930
<u> </u>	1998-1999	3,546						131		(789)		(980)		1,908
_	1996-1997 and prior years	2,611	_				_	416	_	(246)	_	(1,742)	_	1,039
		\$ 14,799	\$_	257,172	\$_	(6,093)	\$	912	\$_	(2,941)	\$_	(247,778)	\$_	16,071

Fiscal Year 2000

	-	Amounts Uncollected June 30, 1999	_	Levy/ Assessments as Extended by Assessor	_	Discounts Allowed	-	Interest Received	-	Cancellations and Adjustments	-	Interest and Tax/ Assessment Collections	-	Amounts Uncollected June 30, 2000
General Fund Special Assessme	ent													
1999-2000	\$	-	\$	256,666	\$	(6,169)	\$	138	\$	(207)	\$	(241,786)	\$	8,642
1998-1999		7,559						312		(269)		(4,056)		3,546
1997-1998		3,357						261		(166)		(1,636)		1,816
1996-1997 and prior years		2,037	_		_		_	318	_	(124)	_	(1,436)	_	795
	\$	12,953	\$_	256,666	\$_	(6,169)	\$_	1,029	\$_	(766)	\$_	(248,914)	\$_	14,799

DUNTHORPE-RIVERDALE SERVICE DISTRICT NO. 1 A COMPONENT UNIT OF

MULTNOMAH COUNTY, OREGON RECONCILIATION OF BUDGETARY REVENUES TO INTEREST AND TAX/ASSESSMENT COLLECTIONS

(Unaudited - See accompanying auditors' report)

	Year ended June 30						
		2001		2000			
Revenues, per Schedule of Revenues and Expenditures - Budget and Budgetary Basis Actual:							
Assessments - sewer	\$	248,436	\$	253,259			
Add (Subtract): Sales on foreclosure Miscellaneous revenues Sixty day tax/assessment accrual, net	_	(99) (559)		(260) (3,770) (315)			
Interest and Tax/Assessment Collections, per Schedule of Special Assessment Transactions	\$	247,778	\$	248,914			

REPORTS OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS REQUIRED BY STATUTES

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Report of Independent Certified Public Accountants on the District's Compliance and Certain Items Based on an Audit of General Purpose Financial Statements Performed in Accordance with Oregon Auditing Standards

The Board of County Commissioners Dunthorpe-Riverdale Service District No. 1

We have audited the general purpose financial statements of Dunthorpe-Riverdale Service District No. 1 as of and for the year ended June 30, 2001 and have issued our report thereon dated December 4, 2001. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the provisions of the Minimum Standards for Audits of Oregon Municipal Corporations, prescribed by the Secretary of State. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the general purpose financial statements are free of material misstatement.

Compliance with laws, regulations, contracts and grants applicable to Dunthorpe-Riverdale Service District No. 1 is the responsibility of District's management. As part of obtaining reasonable assurance about whether the general purpose financial statements are free of material misstatement, we performed tests of the District's compliance with certain provisions of laws, regulations, contracts and grants. However, our objective was not to provide an opinion on overall compliance with such provisions. Accordingly, we do not express such an opinion. Certain areas covered, as required by Oregon Administrative Rules 162-10-230 through 162-10-320, included but were not limited to the following:

Accounting and Internal Control Structure - Our report on the accounting and internal control structure is presented separately under this cover.

Programs funded from outside sources - Pertaining to programs funded with state and federal revenues, if any.

Financial Reporting Requirements - Whether financial reports and related data filed with other governmental agencies, if any, in conjunction with programs funded wholly or partially by such agencies were in agreement with or supported by the accounting records.

Compliance with Legal or Other Requirements -

Accounting Records - Pertaining to the condition and adequacy of accounting records

Collateral - Pertaining to the amount and adequacy of collateral pledged by depositories to secure the deposit of public funds

Budget - Relating to the preparation, adoption and execution of the annual budget for the current fiscal year and the preparation and adoption of the budget for the next succeeding fiscal year.

Insurance - Relating to insurance and fidelity bond coverage

Investments - Pertaining to the investment of public funds

Public Contracts and Purchasing - Pertaining to (as contained in ORS Chapter 279) the advantage of public contracts and the construction of public improvements

The results of our tests indicate that, with respect to the items tested, Dunthorpe-Riverdale Service District No. 1 complied in all materials respects with the provisions referred to above. With respect to items not tested, nothing came to our attention that caused us to believe that the District had not complied, in all material respects, with those provisions.

This report is intended solely for the use of management, the Board of County Commissioners and the Secretary of State, Division of Audits, of the State of Oregon and is not intended to be and should not be used by anyone other than these specified parties.

Portland, Oregon December 4, 2001

/s/ Grant Thornton LLP

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Report of Independent Certified Public Accountants on the District's Internal Control Structure Based on an Audit of General Purpose Financial Statements

The Board of County Commissioners Dunthorpe-Riverdale Service District No. 1

We have audited the general purpose financial statements of the Dunthorpe-Riverdale Service District No. 1 as of and for the year ended June 30, 2001 and have issued our report thereon dated December 4, 2001. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the provisions of the Minimum Standards for Audits of Oregon Municipal Corporations, prescribed by the Secretary of State. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the general purpose financial statements are free of material misstatement.

The management of the Dunthorpe-Riverdale Service District No. 1 is responsible for establishing and maintaining an internal control structure. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of internal control structure policies and procedures. The objectives of an internal control structure are to provide management with reasonable, but not absolute, assurance that assets are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of general purpose financial statements in accordance with generally accepted accounting principles. Because of inherent limitations in any internal control structure, errors or irregularities may nevertheless occur and not be detected. Also, projection of any evaluation of the structure to future periods is subject to the risk that procedures may become inadequate because of changes in conditions or that the effectiveness of the design and operation of policies and procedures may deteriorate.

In planning and performing our audit of the general purpose financial statements of Dunthorpe-Riverdale Service District No. 1, for the year ended June 30, 2001, we obtained an understanding of the internal control structure. With respect to the internal control structure, we obtained an understanding of the design of relevant policies and procedures and whether they have been placed in operation, and we assessed control risk in order to determine our auditing procedures for the purpose of expressing our opinion on the general purpose financial statements and not to provide an opinion on the internal control structure. Accordingly, we do not express such an opinion.

Our consideration of the internal control structure would not necessarily disclose all matters in the internal control structure that might be material weaknesses under standards established by the American Institute of Certified Public Accountants. Those standards define a material weakness as a condition in which the design or operation of one or more of the specific internal control structure elements does not reduce to a relatively low level the risk that errors or irregularities in amounts that would be material in relation to the general purpose financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. We noted no matters involving the internal control structure and its operation that we consider to be material weaknesses as defined above.

This report is intended solely for the use of management, the Board of County Commissioners and the Secretary of State, Division of Audits, of the State of Oregon and is not intended to be and should not be used by anyone other than these specified parties.

Portland, Oregon December 4, 2001

/s/ Grant Thornton LLP